

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. RENÉE MARIE BUMB
THIS DOCUMENT RELATES TO: <i>Gaston Roberts et al. v. Zhejiang Huahai Pharmaceutical Co., et al.,</i> Case No. 1:20-cv-00946	

**CERTIFICATION OF ADAM M. SLATER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE
THE OPINIONS OF PLAINTIFFS' EXPERT JOHN RUSSO, M.D.**

ADAM M. SLATER, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and a partner with the law firm of Mazie Slater Katz & Freeman, LLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' opposition to Defendants' motion to exclude the liability opinion of John Russo, M.D.

2. Attached hereto as **Exhibit 1** is a true and accurate copy of an excerpt of the transcript of Hai Wang's March 10, 2021 deposition.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: June 26, 2025